

United States Courts
Southern District of Texas
FILED

SEP 04 2019

David J. Bradley, Clerk of Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

V.

AJAY DHINGRA
Defendant.

§
§
§
§
§
§
§

CRIMINAL NO.: 19-648

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Unlawful Possession of a Machinegun)

On or about August 16, 2019, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

AJAY DHINGRA,

did knowingly possess a machinegun, to wit: a Slide Fire bump stock.

In violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT TWO

(False Statement in Connection with the Purchase of Firearms)

On or about September 20, 2016, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

AJAY DHINGRA,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section

921, to wit:

Colt, model Competition, .223 caliber rifle;

from Gander Mountain #404, Katy, Texas, a federally licensed firearms dealer knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented on the Form 4473 that he had not been adjudicated mentally defective and committed to mental institution, when in truth and in fact he had.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT THREE

(False Statement in Connection with the Purchase of Firearms)

On or about August 12, 2017, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

AJAY DHINGRA,

in connection with the acquisition of a firearm, as defined in Title 18 United States Code, Section 921, to wit:

Glock, model 34, 9 mm pistol;

from Academy Store 19 Houston, Texas, a federally licensed firearms dealer knowingly made a false and fictitious statement to the federally licensed firearms dealer or their representative, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented on the Form 4473 that he had not been adjudicated mentally defective and committed

to mental institution, when in truth and in fact he had.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT FOUR

(Possession of a Firearm and Ammunition – adjudicated mentally defective and committed to mental institution)

On or about November 8, 2018, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

AJAY DHINGRA,

knowing he had been adjudicated mentally defective and committed to mental institution, did knowingly possess in and affecting interstate and foreign commerce firearms and ammunition, namely:

Colt, model Competition, .223 caliber rifle;

Glock, model 34, 9 mm pistol; and

277 rounds of 9 mm ammunition.

In violation of Title 18, United States Code, Sections 922(g)(4) and 924(a)(2).

Property Subject to Forfeiture

The property subject to forfeiture includes, but is not limited to, the following property:

1. Glock model 34, 9 mm pistol, serial number ACSE256
2. Colt, model Competition, multi-caliber rifle, serial number CCR009796,
3. A Slide Fire bumpstock, machinegun,
4. 5 AR-15 magazines,
5. 6 Glock magazines,
6. 277 rounds of 9 mm ammunition.

A TRUE BILL

ORIGINAL SIGNATURE ON FILE

FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK
United States Attorney
Southern District of Texas

A handwritten signature in black ink, appearing to read 'STEVEN T. SCHAMMEL', written over a horizontal line.

STEVEN T. SCHAMMEL
Assistant United States Attorney